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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91224702
Party	Plaintiff Sinclair Finance Company
Correspondence Address	JOHN C STRINGHAM WORKMAN NYDEGGER 60 EAST SOUTH TEMPLE, SUITE 1000 SALT LAKE CITY, UT 84111 UNITED STATES jstringham@wnlaw.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	John C. Stringham
Filer's e-mail	jstringham@wnlaw.com
Signature	/John C. Stringham/
Date	02/09/2016
Attachments	Motion to Suspend (2-9-2016).pdf(44764 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

SINCLAIR FINANCE COMPANY	)	
	)	
Opposer,	)	
	)	
v.	)	
	)	Opposition No. 91224702
HONG KONG NETEASE INTERACTIVE	)	
ENTERTAINMENT LIMITED	)	Serial No. 86/500535
	)	
Applicant	)	
	)	
	)	

**MOTION TO SUSPEND FOR SETTLEMENT WITH CONSENT**

Pursuant to 37 C.F.R. § 2.117(c), and the Trademark Trial and Appeal Board Manual of Procedure (“TBMP”) § 510.03, Opposer Sinclair Finance Company (“Opposer”) and Applicant, Hong Kong NETEASE Interactive Entertainment Limited (“Applicant”) hereby move to suspend the above-referenced proceedings for a period of sixty (60) days to allow the parties time to pursue settlement discussions. Opposer has secured the express consent of counsel for Applicant. This motion is supported by good cause and is not for the purpose of delay.

On January 15, 2016 the Board denied the parties motion to suspend on the basis that the Board did not find good cause to suspend because the parties had not yet conducted the required discovery conference. The order left the disclosure, discovery and trial dates as previously set in the Board’s order of November 3, 2015. The Board further suggested that the parties conduct the required discovery conference without delay. As the Board directed, the parties conducted the required discovery conference on January 28, 2016.

In that the parties have now conducted the required discovery conference, Opposer and Applicant respectfully request that the Board suspend this proceeding for a period of sixty (60) days to allow the parties to conduct settlement discussions.

Below is the proposed schedule with a full set of deadlines as requested by the Board reflecting the sixty (60) day suspension request as of the date of this motion.

Discovery Opens	4/8/2016
Initial Disclosures Due	5/11/2016
Expert Disclosures Due	9/10/2016
Discovery Closes	10/10/2016
Plaintiff’s Pretrial Disclosures	11/24/2016

Plaintiff's 30-day Trial Period Ends	1/8/2016
Defendant's Pretrial Disclosures	1/23/2016
Defendant's 30-day Trial Period Ends	3/7/2016
Plaintiff's Rebuttal Disclosures	3/22/2016
Plaintiff's 15-day Rebuttal Period Ends	4/21/2017

Dated this 9th day of February, 2016.

Respectfully submitted,

WORKMAN NYDEGGER

/John C. Stringham/

John C. Stringham

WORKMAN NYDEGGER

60 East South Temple, Suite 1000

Salt Lake City, Utah 84111

jstringham@wnlaw.com

Tel: 801-533-9800

Fax: 801-328-1707

Attorneys for Opposer

Sinclair Finance Company

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing MOTION TO SUSPEND has been served by electronic mail on Applicant's Attorneys of Record at [cmei@fidelitylegalservices.com](mailto:cmei@fidelitylegalservices.com). The parties have consented to service by email.

Dated February 9, 2016.

s/John C. Stringham/  
John C. Stringham  
WORKMAN NYDEGGER